



Cox Communications – Regulatory Affairs
6205-B Peachtree Dunwoody Rd.
Atlanta, GA 30328
404.269.0983 tel
joiava.philpott@cox.com

Joiava Philpott
VICE PRESIDENT

August 9, 2017

Via Electronic Submission

Marlene Dortch
Secretary, Federal Communications Commission
445 12th Street SW, Room TW0A325
Washington, DC 20554

Re: Cox Communications, LLC Lifeline Biennial Audit Report, *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42


Dear Ms. Dortch:

Cox Communications, Inc. (“Cox”) hereby requests a 6-week extension of time to submit its final Lifeline biennial audit report by September 22, 2017.¹

As the largest cable telephony operator participating in the Lifeline program, with over 34,000 customers in 14 states, Cox shares the Commission’s goal to minimize waste, fraud, and abuse in the Lifeline program. Accordingly, Cox has been working diligently with its third-party auditor, Deloitte & Touche LLP (“Deloitte”) over the past seven months to complete a biennial audit. Deloitte submitted its draft Agreed-Upon Procedures Lifeline Audit Report of Cox and Cox’s response to the Universal Service Administrative Company (USAC) on August 8, 2017. However, unless USAC reduces its 30-day review time for the draft, Cox will be unable to submit the final audit report to the Commission by the original due date of August 10, 2017. Grant of this brief extension request will allow USAC to conduct a thorough 30-day review of the draft report and Deloitte to incorporate any necessary changes to the draft.

Cox appreciates your consideration of this request. Please contact me directly should you have any questions.

Respectfully submitted,

By: 
Joiava Philpott
Vice President, Regulatory Affairs
Cox Communications, Inc.
6205 Peachtree Dunwoody Road
Atlanta, GA 30328

cc Charles Tyler (via electronic mail)

¹ To the extent necessary, Cox requests a waiver of Section 54.420 of the Commission’s rules. 47 C.F.R. § 54.420. There is good cause for a waiver here, as the requested brief extension of time will further the purpose of the audit rule and the public interest by ensuring that USAC has sufficient time to review the draft report before it is finalized.